

August 3, 2023

Mr. Dean E. Starook, Groundwater Remediation Specialist  
Virginia Department of Environmental Quality  
Piedmont Regional Office  
4949-A Cox Road  
Glen Allen, Virginia 23060

Electronically submitted to: Starook, Dean [dean.starook@deq.virginia.gov](mailto:dean.starook@deq.virginia.gov)

**RE: Green Ridge Recycling and Disposal Facility, LLC  
SWP 626  
Notice of Intent and Part A Application – Technical Review 2 (06/16/2022)  
Response to Technical Review 2  
DAA Job Number: 18020117-090102 (TRC 17319)**

Dear Mr. Starook:

On behalf of Green Ridge Recycling and Disposal Facility, LLC (Green Ridge), TRC Companies, LLC (formerly Draper Aden Associates) is pleased to submit responses to DEQ's Technical Review 2 (TR 2), dated June 16, 2022. The TR 2 letter is included with this submittal as **ATTACHMENT 01**. Your letter requested clarification of several items and a final updated Part A application incorporating previous responses. A response letter to the TR 2 addendum is being provided under separate cover.

Based on multiple discussions with DEQ it is our understanding that, unless there was a specific comment included in TR 2, all information provided in the TR 1(October 21, 2021) response, and the TR 1 Supplement (April 13, 2022) response has been accepted as technically adequate at this time at this time. This information has been incorporated into the Final Part A Submission as applicable.

Listed below, as they appeared in TR 2, are the DEQ comments (in italics), followed by our corresponding response.

1.) *The facility responses and supplemental information contain various updates to the base grade elevation, and other pertinent information relating to the proposed facility. The Response to Technical Review 1 revised the lowest base grade elevation to 276.63 above mean seal level (AMSL). The Supplement to Response TR-1 revised the lowest base grade elevation to 286.45 AMSL. The Part A Form and Part A Application, cross-sections and reports should be revised as necessary to include the most current updated lowest base grade elevation.*

**Response:** As provided in the TR 1 Supplement response, the lowest base grade elevation is 287.47 AMSL. It is unclear where the DEQ elevation of 286.45 came from. The PTA Form was not revised for the TR 1 Supplement pending approval of the submittal by DEQ. The DEQ PTA Form and transmittal letter have

been updated to incorporate the TR 1 Supplement information and included in the Final Part A Submission. The updated form with cover page is attached here as **ATTACHMENT 02**.

2.) *The October Response to Technical Review 1 included several drawings, cross-sections and reports with revised waste management and disposal unit boundaries. The waste management and disposal unit boundaries are depicted in bearings and distances. The Near Vicinity Map and Figures B and C should include a survey tie line from the metes and bounds facility boundary survey, to the bearings and distances used in the waste management and disposal unit boundary surveys.*

**Response:**

Included in **Attachment PTA-IX** (Final Part A Submission – August 2023) are the following documents:

- An updated Near Vicinity Map (PTA Attachment IX – Figure 2A) dated August 3, 2023;
- An updated Facility Boundary exhibit with metes and bounds (PTA Attachment IX – Figure 2B) dated August 3, 2023;
- An updated Waste Management Boundary exhibit with bearings and distances (PTA Attachment IX – Figure 2C) dated August 3, 2023; and
- An updated Initial Disposal Unit Area exhibit with bearings and distances (PTA Attachment IX – Figure 2D) dated August 3, 2023.

Figure 2A does not include any metes/bounds or bearings/distances due to the complexity and scale of the drawing. (This was discussed in the TR 1 response.) Instead separate figures are provided (Figure 2B, 2C and Figure 2D). Figure 2B is tied to state plane with coordinates indicated on three monuments identified on the figure. Figure 2C is now tied to the property line which is now tied to state plane. Figure 2D is provided for informational purposes and represents the initial disposal unit area. It is also tied to the property line.

On June 29, 2023, DEQ provided some additional comments in an email. Comment 2 requested that the existing monumentation as provided on the surveyed property boundary be included on the other Near Vicinity Maps (Figures 2C and 2D). This has been addressed and the figures can be found in **PTA Attachment IX** in the Final Part A Submission being provided under separate cover.

3.) *Drawings and reports in the Part A Application that include incorrect or inconsistent waste management boundaries, disposal unit boundaries, base grade, cross-sections, or other facility information should be updated and replaced. A licensed professional engineer or geologist should stamp all revised drawings.*

**Response:** As requested, an updated Part A application incorporating previous responses including drawings and reports has been prepared. The Final Part A Submission, addressing all DEQ comments, is provided under separate cover. As appropriate, a licensed professional engineer or geologist has reviewed the documentation and the final documents submitted to DEQ include the seal, signature and date of the appropriate representative.

Mr. Dean E. Starook  
August 3, 2023  
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*Additional work is ongoing to address all permits and requirements necessary for this project. It is recommended that the Part A Form, and the Part A NOI and Application, be revised to include all supplemental and updated facility information, reports, cross-sections, and drawings, as discussed above, and re-submitted to the Department.*

**Response:** Our response to Comment 3 above addresses this summation paragraph. The Final Part A Submission addresses changes and/or modifications to previous documents.

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With the Final Part A Submission, dated August 2023, DEQ should have all information needed to complete its review of the Part A and to ultimately provide approval. Your timely review is greatly appreciated.

Should you have any questions or require additional information, please contact Ms. Wendy Karably at [wkarably@trccompanies.com](mailto:wkarably@trccompanies.com) or Mr. Mike Lawless at [mlawless@trccompanies.com](mailto:mlawless@trccompanies.com).

Sincerely,

**DRAPER ADEN ASSOCIATES**



Michael D. Lawless, P.G, CPG  
Principal

**Letter Attachments:**

Attachment 01      VDEQ – June 16, 2022 - TR 2 comment letter  
Attachment 02      PTA Form and cover page – signed 7/27/23

cc:      Kathryn Perszyk, DEQ-CO  
         Shawn Weimer, DEQ-PRO  
         Jerry Cifor, Green Ridge  
         Will Shewmake, Woods Rogers Vandeventer Black  
         Wendy Karably, TRC Companies, Inc.  
         Lynn P. Klappich, TRC Companies, Inc.  
         Debbie Coakley, TRC Companies, Inc.



ATTACHMENT 01

VDEQ June 16, 2022 – TR 2 Comments



*Commonwealth of Virginia*

***VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY***

PIEDMONT REGIONAL OFFICE

4949-A Cox Road, Glen Allen, Virginia 23060

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Travis A. Voyles  
Acting Secretary of Natural and Historic Resources

Michael S. Rolband, PE, PWD, PWS Emeritus  
Director  
(804) 698-4020

Jerome A. Brooks  
Regional Director

June 16, 2022

Mr. Jerry Cifor  
President  
Green Ridge Recycling and Disposal LLC  
12230 Deergrove Road  
Midlothian, Virginia 23112

**Subject: Green Ridge Recycling and Disposal Facility, LLC  
Notice of Intent and Part A Application – Technical Review 2**

Dear Mr. Cifor:

The Virginia Department of Environmental Quality (DEQ) Piedmont Regional Office (PRO) is in receipt of a Notice of Intent (NOI) and Part A Permit Application for the Green Ridge Recycling and Disposal Facility, LLC, dated January 17<sup>th</sup> and received on January 22, 2020. Additional information was received by the Department April 16, 2020 and October 28, 2020 regarding Disclosure Statements, January 08, 2021 regarding the Demonstration of Need, and February 16, 2021 regarding Public Water Supplies. The NOI and Part A Permit Application, and supplemental information, was prepared by Draper Aden Associates, LLC, on behalf of the Green Ridge Recycling and Disposal Facility, LLC.

The NOI and Part A Permit Application were reviewed for administrative completeness in accordance with § 9 VAC 20-81-450.A, B, and C, § 9 VAC 20-81-460, and § 9 VAC 20-81-120 of the Virginia Solid Waste Management Regulations (VSWMR, 9 VAC 20-81-10, *et seq.*) and found to be ***administratively complete*** in a Final Completeness Review letter dated December 11, 2020. The application was subsequently reviewed for technical adequacy and regulatory compliance and found to be ***technically inadequate*** in the Department's first technical review, dated April 08, 2021.

The facility submitted a "Response to Technical Review 1," with 16 Attachments, dated October 01, 2021, and submitted a "Supplement to Response TR-1," with 7 Attachments, dated April 13, 2022, prepared by Draper Aden Associates and Schnabel Engineering, P.C.

Subsequently, this application has been reviewed for technical adequacy and regulatory compliance. Based on this technical review, the Part A Permit Application appears to be ***technically inadequate*** and the following items need to be addressed in a subsequent revision:

- 1.) The facility responses and supplemental information contain various updates to the base grade elevation, and other pertinent information relating to the proposed facility. The Response to Technical Review 1 revised the lowest base grade elevation to 276.63 above mean seal level (AMSL). The Supplement to Response TR-1 revised the lowest base grade elevation to 286.45 AMSL. The Part A Form and Part A Application, cross-sections and reports should be revised as necessary to include the most current updated lowest base grade elevation.
- 2.) The October Response to Technical Review 1 included several drawings, cross-sections and reports with revised waste management and disposal unit boundaries. The waste management and disposal unit boundaries are depicted in bearings and distances. The Near Vicinity Map and Figures B and C should include a survey tie line from the metes and bounds facility boundary survey, to the bearings and distances used in the waste management and disposal unit boundary surveys.
- 3.) Drawings and reports in the Part A Application that include incorrect or inconsistent waste management boundaries, disposal unit boundaries, base grade, cross-sections, or other facility information should be updated and replaced. A licensed professional engineer or geologist should stamp all revised drawings.

Additional work is ongoing to address all permits and requirements necessary for this project. It is recommended that the Part A Form, and the Part A NOI and Application, be revised to include all supplemental and updated facility information, reports, cross-sections, and drawings, as discussed above, and re-submitted to the Department.

Please note the letter should not be considered a legal opinion or a case decision as defined by the Administrative Process Act, Code of Virginia § 2.2-4000 *et seq.* If you have any questions about this matter, please contact me at (804) 712-9102, or by e-mail at [dean.starook@deq.virginia.gov](mailto:dean.starook@deq.virginia.gov).

Sincerely,



Dean E. Starook  
Groundwater Remediation Specialist

cc: Michael D. Lawless, P.G., C.P.G., Draper Aden Associates  
Lynn P. Klappich, Draper Aden Associates  
JengHwa Lyang, DEQ-VRO  
Shawn Weimer, DEQ-PRO

ATTACHMENT 02

PTA Form – signed 7/27/23 and Cover Page

## **PART A – DEQ Form SW PTA**

As required by Submission Instruction No. 1, the applicant is to provide a transmittal letter stating the type of facility proposed with a signed and certified DEQ Form SW PTA.

The Part A Application with form was originally submitted to DEQ on January 22, 2020. It was reviewed by DEQ and Technical Review No. 1 (TR 1) issued on April 8, 2021. TR 1 requested an update of the form with any changes required due to the response to TR 1. Some changes were made, and the form was reissued on October 1, 2021. The TR 1 response on October 1, 2021 did not address Comments 11, and 14 through 16, which required additional field work.

On April 13, 2022, a Supplement to TR 1 response was submitted to address these comments. The Supplement response letter discussed that the bedrock boring was advanced to a depth more than 20 feet below the TR 1 lowest base grade of 276.63 feet msl. The letter then goes on to indicate that to reduce bedrock excavation and to incorporate the additional information, the base grades in the northern portion of the facility were raised. Figure LA-10 included with the Supplement indicated the lowest base grade at an elevation of 287.47.

Subsequently, DEQ issued Technical Review No. 2 (TR 2) on June 16, 2022 with an addendum to TR 2 issued on October 25, 2022. Comment 1 of TR 2 specifically addressed the form and the lowest base grade and asked for clarification. (The comment identifies the lowest base grade as 286.45 but Figure LA-10 calls out the lowest base grade at the elevation identified above.)

On May 12, 2023, a draft TR 2 response addressing updates to the Part A documents was submitted by TRC to DEQ for review and comment. Comments were received from DEQ via email on June 29, 2023. No comments were received on this form.

The Final Part A Submission form incorporates all the TR 1, TR 2 and TR 2 Supplement information.

The final form, signed by the applicant is included with the Final Part A Submission. It replaces all previous forms.





# Solid Waste Disposal Facility Part A Application Form, DEQ Form SW PTA

Please specify, is this application for a

☒ New Facility or

☐ Part A Modification

Final Part A Submission – August 2023

## I. FACILITY INFORMATION

### A. Facility Location

Facility Name: Green Ridge Recycling and Disposal Facility

Permit No. SWP 626

Location Address: US Route 60/Pinegrove Road/Miller Lane

Facility Type: Sanitary Landfill

City, State, Zip: Cumberland, VA 23040

Latitude: 37 Deg 34 Min 00 Sec North

Longitude: 78 Deg 07 Min 20 Sec West

### B. Facility Contact Information

Contact Person: Mr. Jerry Cifor

Contact Title: President and CEO

Contact Phone: 802-379-1575

Contact E-mail: jerry.cifor@myfairpoint.net

Owner: Green Ridge Recycling and  
Disposal Facility, LLC

Operator: Green Ridge Recycling and  
Disposal Facility, LLC

Mailing Address: 12230 Deer Grove Road

Mailing Address: 12230 Deer Grove Road

City, State, Zip: Midlothian, VA 23112

City, State, Zip: Midlothian, VA 23112

### C. Solid Waste Disposal Facility Information

Total Property Acreage: 1,177.63 acres

Facility Boundary: 1,177.63 acres

Waste Management Boundary Acreage: 428.0 acres

Total Capacity: 54,000,000 cubic yards

Maximum Elevation: 690 ft AMSL

Total Number of Borings: 74 (TR-1)

Lowest Base grade Elevation: 287.47 ft AMSL  
(TR 1 Supplement information)

Daily Disposal Limit: 1,500 tons/day(TR-2)

## II. SITING ASSESSMENT

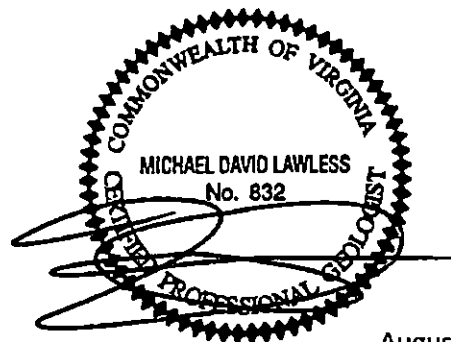
### A. Applicable to All Solid Waste Disposal Facilities

Answer the following questions by entering "yes", "no", or a numeric response, as applicable. For distances, indicate the shortest measured distance from any disposal unit or leachate storage area (i.e. waste management boundary), reported in feet.

Siting Criteria	Response
1. Is the landfill located in a 100 year floodplain?	No
2. Is the landfill located in a geologically stable area?	Yes
3.a.i. Distance to nearest residence:	510 ft
3.a.ii. Distance to nearest school:	Approx. 7.7 miles
3.a.iii. Distance to nearest daycare center:	Approx. 7.5 miles
3.a.iv. Distance to nearest hospital:	Approx. 23.0 miles
3.a.v. Distance to nearest nursing home:	Approx. 7.5 miles
3.a.vi. Distance to nearest recreational park:	Approx. 3.0 miles
3.b. Distance from any perennial stream or river:	>100 ft
3.c. Distance from the Facility Boundary:	>200 ft
3.d. Distance from any well, spring, or other groundwater source of drinking water in existence at the time of application:	500+ ft
3.e. Distance from the nearest edge of right-of-way of any interstate or primary highway:	3,960+ ft
3.f. Distance from the nearest edge of right-of-way of any other highway or city street:	285+ ft

Siting Criteria	Response
4. Is the landfill located in a park or recreational area, wildlife management area or area designated by the federal or state agency as the critical habitat of any endangered species?	No
5.a. Does the facility have the ability to conduct groundwater monitoring in accordance with 9 VAC 20-81-250?	Yes
5.b. Does the facility have the ability to characterize the rate and direction of groundwater flow within the uppermost aquifer?	Yes
5.c. Does the facility have the ability to characterize and define any releases from the landfill, so as to determine what corrective actions are necessary?	Yes
5.d. Does the facility have the ability to perform corrective action as necessary?	Yes
6. Is the landfill located in a tidal or nontidal wetland? (Yes or No)	No
6.a. If the answer to #6 is "yes" list the total number of nontidal wetland acres to be impacted:	NA
7.a. Does the proposed site include excessive slopes (greater than 33%)?	No
7.b. Does the proposed site lack readily available cover materials or lack of a firm commitment for adequate cover material from a borrow site?	No
7.c. Does the proposed site contain springs, seeps, or other ground water intrusion?	No
7.d. Does the proposed site contain gas, water, sewage, or electrical or other transmission lines?	Yes
7.e. Does the site contain the prior existence of an open dump, unpermitted landfill, lagoon, or similar unit, even if such a unit is closed?	No
8. Does the facility have adequate area and terrain for leachate management?	Yes

Professional Geologist or Professional Engineer  
Certification: To the best of my knowledge, information and belief, the answers to question number 5.a. through 5.d. are, in my professional opinion, in compliance with applicable laws, codes, and ordinances. (Stamp, sign, and date in space to right)



#### B. Additional Siting Criteria for Sanitary Landfills

August 1, 2023

The following criteria are only applicable to sanitary landfills. Answer the following questions by entering "yes", "no", or a numeric response, as applicable. For distances, indicate the shortest measured distance from any disposal unit or leachate storage area (i.e. waste management boundary), reported in feet or miles.

Siting Criteria	Response
9.a. Distance to existing surface or groundwater public water supply intake or reservoir that are downgradient of the landfill (in miles):	15.7 miles
9.b. Distance to existing surface or ground water public water supply intake or reservoir that are upgradient of the landfill (in miles):	3.96 miles
9.c. Is the landfill located in an area vulnerable to flooding caused by dam failures?	No
9.d. Is the landfill located over a sinkhole or within 100 feet of a solution cavern associated with karst topography?	No
9.e. Is the landfill located over a fault that has had displacement in Holocene time?	No
9.f. Distance from a fault that has had displacement in Holocene time (in feet):	200+ ft
9.g. Is the landfill located within a seismic impact zone?	Yes
9.h. Distance from any airport runway end used by turbojet or piston-type aircraft:	>13 miles



### C. Additional Siting Criteria for Construction, Demolition, & Debris Landfills

The following criteria are only applicable to construction, demolition, and debris (CDD) landfills. Answer the following questions by entering "yes", "no", or a numeric response, as applicable. For distances, indicate the shortest measured distance from any disposal unit or leachate storage area (i.e. waste management boundary), reported in feet or miles.

Siting Criteria	Response
10.a. Is the facility located in a strip mine pit?	No
10.b. If the answer to #10.a. is "yes", indicate minimum distance between coal seams / coal outcrops and solid waste materials.	n/a

### D. Variances

Does this application include a variance request(s) to regulatory siting requirements? ☐ Yes ☒ No

If yes, list regulatory citation(s): \_\_\_\_\_


### III. PART A APPLICATION ATTACHMENTS

The following items shall be provided as an attachment to this form and will constitute the facility's Solid Waste Part A Permit application. Please indicate whether each item is 'included' for the proposed facility or facility modification.

Solid Waste Permit Part A Application Attachments	Included?
Attachment I: Cover Letter, Area Map, and Site Location Map	<input checked="" type="checkbox"/>
Attachment II: Disclosure Statements (DEQ Forms DISC-01 and DISC-02)	<input checked="" type="checkbox"/>
Attachment III: Local Government Certification (DEQ Form SW-11-1)	<input checked="" type="checkbox"/>
Attachment IV: Public Participation Documentation	<input checked="" type="checkbox"/>
Attachment V: Disposal Capacity Guarantee	<input checked="" type="checkbox"/>
Attachment VI: Host Agreement (DEQ Form SW-11-2) or Discussion of Disposal Limits/Service Area	<input checked="" type="checkbox"/>
Attachment VII: Demonstration of Need	<input checked="" type="checkbox"/>
Attachment VIII: State Commission Corporation Certification	<input checked="" type="checkbox"/>
Attachment IX: Key Map, Near-Vicinity Map, and Regional Map	<input checked="" type="checkbox"/>
Attachment X: Proof of Ownership Documents	<input checked="" type="checkbox"/>
Attachment XI: Hydrogeologic and Geotechnical Report (must be certified by P.E. or P.G.)	<input checked="" type="checkbox"/>
Attachment XII: Location of Borings and Boring Logs	<input checked="" type="checkbox"/>
Attachment XIII: Laboratory and Field Data	<input checked="" type="checkbox"/>
Attachment XIV: Materials Volume Calculations	<input checked="" type="checkbox"/>
Attachment XV: Geologic Maps, Orthogonal Cross-Sections, and Potentiometric Surface Maps	<input checked="" type="checkbox"/>
Attachment XVI: VDOT Adequacy Report and Approval Letter	<input checked="" type="checkbox"/>
Attachment XVII: Landfill Impact Statement	<input checked="" type="checkbox"/>
Attachment XVIII: Certification and Documentation of Adjacent Property Owner Notification	<input checked="" type="checkbox"/>
Attachment XIX: Discussion of Public Interest Served	<input checked="" type="checkbox"/>
Attachment XX: Airport Proximity and Agency Coordination	<input checked="" type="checkbox"/>
Attachment XXI: FEMA Flood Insurance Rate Map	<input checked="" type="checkbox"/>
Attachment XXII: Wetlands Demonstration and Agency Coordination	<input checked="" type="checkbox"/>
Attachment XXIII: Demonstration Regarding Proximity to a Fault or Siting within a Seismic Impact Zone	<input checked="" type="checkbox"/>
Attachment XXIV: Request for Exemption of Site for 9 VAC 20-81-120.D. and/or 120.F.	<input type="checkbox"/>

#### IV. RESPONSIBLE OFFICIAL SIGNATURE

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering the information, the information submitted is to the best of my knowledge and belief true, accurate, and complete.

SIGNATURE:  President DATE: 7/27/2023  
NAME: Mr. Jerry Cifor  
TITLE: President and CEO - Green Ridge Recycling and Disposal, LLC

August 3, 2023

Mr. Dean E. Starook, Groundwater Remediation Specialist  
Virginia Department of Environmental Quality  
Piedmont Regional Office  
4949-A Cox Road  
Glen Allen, Virginia 23060

Electronically submitted to: Starook, Dean [dean.starook@deq.virginia.gov](mailto:dean.starook@deq.virginia.gov)

**RE: Green Ridge Recycling and Disposal Facility, LLC  
SWP 626  
Notice of Intent and Part A Application – Addendum to Technical Review 2 (10/25/2022)  
Response to Technical Review 2 Addendum  
DAA Job Number: 18020117-090102 (TRC 17319)**

Dear Mr. Starook:

On behalf of Green Ridge Recycling and Disposal Facility, LLC (Green Ridge), TRC Companies, LLC (formerly Draper Aden Associates) is pleased to submit responses to Virginia Department of Environmental Quality's (DEQ) Technical Review 2 Addendum, dated October 25, 2022. The Technical Review 2 addendum (TR 2 ADD) letter is included with this submittal as **ATTACHMENT 01**. Your letter requested clarification of several issues relative to perennial streams and the potential need for a variance request. Listed below, as they appeared in the DEQ's TR 2 ADD, are the DEQ comments (in italics), followed by our corresponding response:

*The Virginia Department of Environmental Quality (DEQ) Piedmont Regional Office (PRO) solid waste program is coordinating its review of the Notice of Intent (NOI) and Part A Permit Application for the Green Ridge Recycling and Disposal Facility, LLC, with the Virginia Water Protection (VWP) program staff. Based on review of the Joint Permit Application (JPA) received by the VWP program, the proposed project will impact perennial stream resources located within the area of proposed disposal units. It appears that these streams within the disposal area are fed by springs or groundwater seeps.*

**Response:** As has been reviewed with DEQ, Green Ridge has reconfigured the initial disposal unit area. Figure 1, which was prepared for the TR 2 response and is included herein as **ATTACHMENT 02**, illustrates the proposed initial disposal unit area. The initial disposal unit area will not impact wetlands or streams that would require a permit from ACOE or the DEQ VWP program. This includes consideration of both primary and secondary impacts. Hence, the JPA was withdrawn on July 21, 2023 via a letter dated July 12, 2023 submitted by KBJW to VMRC, DEQ-VWP, and ACOE. The Part A has been updated accordingly.

*The Virginia Solid Waste Management Regulations (VSWMR, 9 VAC 20-81-10, et seq.) siting requirements as specified in 9 VAC 20-81-120.C.1.b. state, “**No disposal unit or leachate storage unit shall be closer than: ... 100 feet from any perennial stream or river.**” Additionally, 9 VAC 20-81-120.F.1.c. states, “**Certain site characteristics may prevent approval or require substantial limitations on the site use or require the incorporation of sound engineering controls. Such site characteristics shall be identified and an explanation of precautions necessary to assure compliance with the provisions of this chapter shall be provided. Examples include:...Springs, seeps, or other groundwater intrusion into the site;...**” The Part A Application Form, and portions of the NOI and Part A Permit Application, indicate that the distance from proposed disposal units or leachate storage areas to any perennial stream or river is 100 feet, and there are no springs present.*

**Response:** The initial disposal unit area meets the siting requirements of VSWMR 9 VAC 20-81-120.C.1.b.

*Based on information provided in the VWP application, the waste management boundary encompassing the proposed landfill disposal and leachate storage units does not appear to meet the VSWMR siting requirements nor has DEQ received a request for a variance to the permitting requirements as described in Part VII of the VSWMR (9 VAC 20-81-700 through 760). Please be advised that DEQ cannot determine site suitability until such time that the proposed landfill meets the VSWMR siting requirements and the applicable revisions to the NOI and Part A Permit Application have been submitted to DEQ, or DEQ receives revised copies of the NOI and Part A Permit Application and associated permit application documents demonstrating impacts to springs and perennial streams within proposed disposal and leachate storage areas and a request for a variance from the permitting requirements.*

**Response:** The VWP application (aka JPA) was withdrawn on July 21, 2023 via a letter dated July 12, 2023 submitted by KBJW to VMRC, DEQ-VWP, and ACOE. The Final Part A Submission has been updated to reflect this. Based on the initial disposal unit area, the siting requirements are met, and a variance is not required.

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We believe that the narrative above addresses the comments submitted by DEQ.

Mr. Dean E. Starook  
August 3, 2023  
Page 3

Should you have any questions or require additional information, please contact Ms. Wendy Karably at [wkarably@trccompanies.com](mailto:wkarably@trccompanies.com) or Mr. Mike Lawless at [mlawless@trccompanies.com](mailto:mlawless@trccompanies.com).

Sincerely,

**DRAPER ADEN ASSOCIATES**

A handwritten signature in black ink, appearing to read 'Michael D. Lawless', with a horizontal line extending to the right.

Michael D. Lawless, P.G, CPG  
Principal

**Letter Attachments:**

Attachment 01      VDEQ October 25, 2022 – Letter Addendum  
Attachment 02      Figure1, Overall Site Layout, prepared by TRC, dated August 3, 2023

cc:      Kathryn Perszyk, DEQ-CO  
         Shawn Weimer, DEQ-PRO  
         Jerry Cifor, Green Ridge  
         Will Shewmake, Woods Rogers Vandeventer Black  
         Wendy Karably, TRC Companies, Inc  
         Lynn P. Klappich, TRC Companies, Inc  
         Debbie Coakley, TRC Companies, Inc

ATTACHMENT 01

VDEQ October 25, 2022 – letter addendum





*Commonwealth of Virginia*

**VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY**

PIEDMONT REGIONAL OFFICE  
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[www.deq.virginia.gov](http://www.deq.virginia.gov)

Travis A. Voyles  
Acting Secretary of Natural and Historic Resources

Michael S. Rolband, PE, PWD, PWS Emeritus  
Director  
(804) 698-4020

Jerome A. Brooks  
Regional Director

October 25, 2022

Mr. Jerry Cifor  
President  
Green Ridge Recycling and Disposal LLC  
12230 Deergrove Road  
Midlothian, Virginia 23112

**Subject: Green Ridge Recycling and Disposal Facility, LLC  
Notice of Intent and Part A Application – Addendum to Technical Review 2  
(dated June 16, 2022)**

Dear Mr. Cifor:

The Virginia Department of Environmental Quality (DEQ) Piedmont Regional Office (PRO) solid waste program is coordinating its review of the Notice of Intent (NOI) and Part A Permit Application for the Green Ridge Recycling and Disposal Facility, LLC, with the Virginia Water Protection (VWP) program staff. DEQ issued a second technical review letter dated June 16, 2022 indicating that the Part A Permit Application appears to be *technically inadequate* and it outlined items that need to be addressed. Based on review of the Joint Permit Application (JPA) received by the VWP program, the proposed project will impact perennial stream resources located within the area of proposed disposal units. It appears that these streams within the disposal area are fed by springs or groundwater seeps.

The Virginia Solid Waste Management Regulations (VSWMR, 9 VAC 20-81-10, *et seq.*) siting requirements as specified in 9 VAC 20-81-120.C.1.b. state, ***“No disposal unit or leachate storage unit shall be closer than: ... 100 feet from any perennial stream or river.”*** Additionally, 9 VAC 20-81-120.F.1.c. states, ***“Certain site characteristics may prevent approval or require substantial limitations on the site use or require the incorporation of sound engineering controls. Such site characteristics shall be identified and an explanation of precautions necessary to assure compliance with the provisions of this chapter shall be provided. Examples include:...Springs, seeps, or other groundwater intrusion into the site;...”*** The Part A Application Form, and portions of the NOI and Part A Permit Application, indicate that the distance from proposed disposal units or leachate storage areas to any perennial stream or river is 100 feet, and there are no springs present.

Based on information provided in the VWP application, the waste management boundary encompassing the proposed landfill disposal and leachate storage units does not appear to meet the VSWMR siting requirements nor has DEQ received a request for a variance to the permitting requirements as described in Part VII of the VSWMR (9 VAC 20-81-700 through 760). Please be advised that DEQ cannot determine site suitability until such time that the proposed landfill meets the VSWMR siting requirements and the applicable revisions to the NOI and Part A Permit Application have been submitted to DEQ, or DEQ receives revised copies of the NOI and Part A Permit Application and associated permit application documents demonstrating impacts to springs and perennial streams within proposed disposal and leachate storage areas and a request for a variance from the permitting requirements.

Please note the letter should not be considered a legal opinion or a case decision as defined by the Administrative Process Act, Code of Virginia § 2.2-4000 *et seq.* If you have any questions about this matter, please contact me at (804) 712-9102, or by e-mail at [dean.starook@deq.virginia.gov](mailto:dean.starook@deq.virginia.gov).

Sincerely,



Dean E. Starook  
Groundwater Remediation Specialist

cc: Michael D. Lawless, P.G., C.P.G., TRC Companies, Inc.  
JengHwa Lyang, DEQ-VRO  
Shawn Weimer, DEQ-PRO

ATTACHMENT 02

Figure 1 – Overall Site Layout

Prepared by TRC, dated August 3, 2023



